

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re: James R. Bryant	)	Case No. 18-15534
	)	Chapter 13 Proceedings
Debtor.	)	Judge Jessica E. Price Smith

**CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTOR'S  
MOTION TO AMEND CHAPTER 13 PLAN**

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee ("Trustee") herein, by and through counsel, and hereby objects to the Debtor's Motion to Amend Chapter 13 Plan filed with this Court on November 26, 2018 (hereinafter "Debtor's Motion"). In support of her objection, the Trustee makes the following representations to the Court:

1. Cuyahoga County holds a statutory lien and not a contractual obligation. Therefore, it is inappropriate to be provided for in Part 3.1 of the Debtor's proposed plan.
2. The Trustee's Objection to Confirmation filed on November 2, 2018 is still outstanding, specifically, the Plan Provisions paragraph: The Debtor has not completed both of the first two sections of Part 5.1.

**WHEREFORE** your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor's Motion for the reasons cited.

Respectfully submitted,

/S/ Holly Davala

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**CERTIFICATE OF SERVICE**

I certify that on December 13, 2018, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Joseph M. Romano, Attorney, on behalf of Debtor, at [jromanolaw@sbcglobal.net](mailto:jromanolaw@sbcglobal.net)

And by regular U.S. mail, postage prepaid, on:

James R. Bryant, Debtor at 23465 Cannon Road, Bedford Heights, OH 44146

/S/ Holly Davala

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